

KAMAL HAJIRI vs HOME OF DOMAINS
SANDRA DAY O'CONNOR U.S. COURTHOUSE
COMPLAINT FOR A CIVIL CASE

Kamal Hajiri
Weteringkade 22B
2515 AP 's Gravenhage
THE NETHERLANDS
kamalhajiri@hotmail.com

<input checked="" type="checkbox"/> FILED <input type="checkbox"/> RECEIVED	<input type="checkbox"/> LODGED <input type="checkbox"/> COPY
NOV 13 2017	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY <u>VA</u> DEPUTY	

October 26, 2017

Sandra Day O'Connor U.S. Courthouse
To: Brian D. Karth
401 W. Washington St, Suite 130
SPC 1 Phoenix, AZ 85003-2118
United States of America

CV-17-04168-PHX-DKD

Dear Brian D. Karth,

I am Kamal Hajiri, owner of several registered patents (EUIPO and USPTO), copyrights and the trademark 'DIVA STASH®'. As such, I like to start a complaint for a civil case because of my complaint at the Czech Arbitration Court with case number 101662 has been rejected on 17-10-2017.

I started the UDRP procedure because of trademark and copyright infringement on disputed domain name 'www.divastash.com' by 'HOME OF DOMAINS' which causes me damage. The word 'divastash' is an invented word. It does not appear in any dictionary and therefore, the word 'divastash' is to be considered as my copyright. The registration of EUTM under number 016917536 for containers for cosmetics, trunks and suitcases, cupboards and mirrors in Nice classes 18, 20 and 21 was earlier than the registration of divastash.com by Home of Domains.

EUTM 016917536 registration by Kamal Hajiri	06/24/2017	14:32:41	Zulu Time Zone
Divastash.com registration by Home of Domains	06/24/2017	15:16:15	Zulu Time Zone

The domain name is identical to my trademark and also infringers on my copyright. The term 'divastash' has never been used for websites, trademarks or any commercial activity and therefore not known by the public until EUTM-office published the application on 05th July 2017. These circumstances indicating internet fraud, cybersquatting and preventing the owner of the trademark from reflecting the mark in a corresponding domain name. Home of Domains' bad faith is also evidenced by offering the website for sale, which also constitutes trademark and copyright infringement. This company has been involved in several UDRP complaints over the years because they track newly filed trademarks and check the terms as .com domain names. If the domain is available they register it and list the domain name for \$ 950,--.

I, Kamal Hajiri have sent several warning letters by email and registered mail started on 09 July 2017 to stop the infringing use of the disputed domain name immediately. Up until now, these letters remained unanswered.

10/26/2017

~~THIS DOCUMENT IS NOT IN PROPER FORM ACCORDING
TO FEDERAL AND/OR LOCAL RULES AND PRACTICES
AND IS SUBJECT TO REJECTION BY THE COURT.~~

REFERENCE Civ LR 5.4, 7.1(b)(1)
(Rule Number/Section)
7.1(a)(2), (3)

1/2

KAMAL HAJIRI vs HOME OF DOMAINS
SANDRA DAY O'CONNOR U.S. COURTHOUSE
COMPLAINT FOR A CIVIL CASE

Copy of the warning letters and printscreens of the disputed website as well as results of the EUIPO and EUTM database of TM number 016917536, the decision of the Czech Arbitration Court with case number 101662 and relevant documents have been attached to the complaint as an annex. (appendix 01 – 30).

I, Kamal Hajiri started this project in 2013 to find the best solutions for women to store their nail polish and make up in a practical and stylish way. Different in this engineering-project is that time and money are subordinate to find the best solution of makeup storage. With the registration of all designs and trademark at the EUIPO the investment must be recouped. For marketing purposes it is of utmost importance that the disputed domain name '**www.divastash.com**' to be transferred to the owner of the trademark.

Also the inaccessibility of the CEO Mr. Goldfarb, the support desk of namesilo.com and Home of Domains makes it very bad. As a company they should know how it feels getting robbed like this.

All the above leads to the conclusion that Home of Domains has registered and is using the disputed domain name in bad faith.

I hope to have you informed enough to make a decision in this case.

Best Regards,

Kamal Hajiri

A handwritten signature in black ink, appearing to be 'Kamal Hajiri', written over the printed name.

KAMAL HAJIRI vs HOME OF DOMAINS
SANDRA DAY O'CONNOR U.S. COURTHOUSE
COMPLAINT FOR A CIVIL CASE

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APPENDIX 04 website infringement divastash
APPENDIX 05 website infringement by namesilo
APPENDIX 06 EUTM 016917536
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APPENDIX 01 PROGRESS PROCEDURE

UDRP ADR 28/08/2017 COMPLAINT
HAJIRI - DIVASTASH.COM, HOME OF DOMAINS / NAMESILO

APPENDIX I APPENDIX 01 PROGRESS PROCEDURE

24/06/2017 registration TradeMark at EUIPO
24/06/2017 internet fraude, domain registration not possible
28/06/2017 infringement by company HOME OF DOMAINS
by cybersquatting and offering for sale www.divastash.com
06/07/2017 Telephone call to company Home of Domains but nobody answers
not possible to leave a voicemail message
08/07-2017 Infringement by NAMESILO.COM by offering for sale
the website www.divastash.com
09/07/2017 Cease & Desist letter sent to company HOME OF DOMAINS
(APP. 02 - APP. 07)
09/07/2017 Answer HOME OF DOMAINS on Cease & Desist letter (APP. 08)
09/07/2017 Reporting abuse at company NAMESILO.COM by
letter "Reseller problem" company HOME OF DOMAINS (APP. 09)
10/07/2017 Telephone call to company Home of Domains but nobody answers
not possible to leave a voicemail message
10/07/2017 Telephone call to company NAMESILO.COM but nobody answers
not possible to leave a voicemail message
11/07/2017 Reporting abuse at company NAMESILO.COM by
letter "Reseller problem" company HOME OF DOMAINS (APP. 10)
11/07/2017 Reporting abuse at company NAMESILO.COM by
letter "Reseller problem" company HOME OF DOMAINS (APP. 11)
11/07/2017 Reporting abuse at company NAMESILO.COM by
letter "Reseller problem" company HOME OF DOMAINS (APP. 11)
11/07/2017 Telephone call to company NAMESILO.COM but nobody answers
not possible to leave a voicemail message
11/07/2017 Chat with company NAMESILO.COM but nobody answers (APP. 12)
11/07/2017 Cease & Desist letter sent to company
HOME OF DOMAINS (APP. 13)
12/07/2017 Reporting abuse at company NAMESILO.COM by
"Reseller problem" company HOME OF DOMAINS
sent Cease & Desist letter
17/07/2017 to CEO NAMESILO.COM Mr. Goldfarb (APP. 14)
Cease & Desist letter sent to company NAMESILO.COM (GOLDFARB),
17/07/2017 registered mail (APP. 15)
RECEIPT Registered Mail Cease & Desist letter
18/07/2017 to company NAMESILO.COM (APP. 16)
Telephone call to company NAMESILO.COM but nobody answers
not possible to leave a voicemail message
24/07/2017 Infringement by company NAMESILO.COM (APP. 17)
24/07/2017 Infringement on "www.divastash.com" (APP. 18)
18/08/2017 Receipt Cease & Desist letter is received
by company NAMESILO.COM (APP. 19)

RESELLER COMPLAINT AND POLICIES company NAMESILO.COM (APP. 20)

25/08/2017 START PROCEDURE at UDRP ADR

25/08/2017 infringement WWW.DIVASTASH.COM (APP. 21)
25/08/2017 infringement company NAMESILO.COM (APP. 22)
28/08/2017 EUIPO DVS RESULTS HAJIRI 27/08/2017 (APP. 23)
28/08/2017 EUIPO DVS RESULTS HAJIRI 27/08/2017 (APP. 24)

28/08/2017 COMPLAINT SENT TO UDRP ADR infringement www.divastash.com

E-mail - kamalhajiri@hotmail.com

2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

Kamal

di 11-7-2017 20:46

Aandomain@homeofdomains.com <domain@homeofdomains.com>;

Urgentie: Hoog

6 bijlagen (2 MB)

2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter.pdf; APPENDIX I_https www.whois.com; whois divastash.pdf; APPENDIX II website infringement divastash.jpg; APPENDIX III website infringement by namesilo.jpg; APPENDIX IV EUTM 016917536.jpg; APPENDIX V E&S00000016917536.pdf;

Van: Kamal <kamalhajiri@hotmail.com>

Verzonden: zondag 9 juli 2017 16:32

Aan: domain@homeofdomains.com; domain@homeofdomains.com; admin@homeofdomains.com

Onderwerp: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

CEASE & DESIST DEMAND

Kamal Hajiri

Weeringkade 22B

2515 AP 's Gravenhage

THE NETHERLANDS

kamalhajiri@hotmail.com

July 10, 2017

Via E-mail and Letter Mail

HOME OF DOMAINS

1928 E. Highland Avenue, Ste F104 PMB# 255

Phoenix, AZ 85016

Dear Sirs,

I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark 'DIVA STASH'. As such, I write because you are infringing on my trademark and causing me damage by cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is the same or similar to a trademark that is owned by someone else.

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith intent to profit from another's mark and the domain name is confusingly similar to my registered

12-7-2017

<https://outlook.live.com/owa/?path=/mail/sentitems/rp>

APPENDIX 02 EMAIL CORRESPONDANCE C&D LETTER HOD

APPENDIX 01 TO 24

28/08/2017

E-mail - kamalhajiri@hotmail.com

pagina 2 van 8

E-mail - kamalhajiri@hotmail.com

pagina 3 van 8

mark. Infringement only for profit purposes and damages the goodwill of the registered mark that result in the loss of the rights to the market.

Your registration (and use) and offering for sale of the domain name 'www.divastash.com' also constitutes cyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad faith, registers a domain name that is identical or confusingly similar to the trademark of another person can be held liable for damages – up to \$100,000 per domain. 15 U.S.C. § 1117(d).

In short, I consider this to be a very serious matter and I will take all necessary and appropriate actions to bring an immediate halt to your blatant and unauthorized use of this trademark. In the interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer you the one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be received no later than July 15, 2017, that:

- i. you have immediately ceased all trademark infringement; and
- ii. you agree not to associate 'DIVA STASH[®]' with you or your commercial activities in any way, at any point in the future; and
- iii. you will immediately transfer your infringing Domain Name to me

If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

Kamal Hajiri

APPENDIX I_https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement 'DIVA STASH[®]'

APPENDIX III website infringement 'DIVA STASH[®]', by namesilo

APPENDIX IV EUTM 016917536

APPENDIX V EMS00000016917536

APPENDIX I_https www.whois.com whois 'www.divastash.com'

<https://outlook.live.com/owa/?path=/mail/sentitems/rp>

12-7-2017

<https://outlook.live.com/owa/?path=/mail/sentitems/rp>

12-7-2017

E-mail - kamalhajiri@hotmail.com

pagina 4 van 8

E-mail - kamalhajiri@hotmail.com

pagina 5 van 8

APPENDIX II website infringement 'DIVA STASH'⁸,

APPENDIX II website infringement divastash.jpg

APPENDIX II website infringement divastash.jpg

APPENDIX IV EUTM 016917536

APPENDIX II website infringement divastash.jpg

APPENDIX III website infringement 'DIVA STASH'⁸, by namesilo

<https://outlook.live.com/owa/?path=/mail/sentitems/rp>

12-7-2017

<https://outlook.live.com/owa/?path=/mail/sentitems/rp>

12-7-2017

APPENDIX V EM5000000016917536

09/07/2017

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Trade mark

DIVA STASH

(210)(300) Application number 016917536

(270) Application language nl

(220) Application date 2017-06-24

Second language en

Trade mark office EUIPO - EUIPO

(390) Registration office EM

Receiving office number E63398696

Receiving office date 2017-06-24

(580) Trade mark type Figurative

(551) Kind of mark Individual

(531) Nice classification 18,20,21

(531)(532) Vienna classification 03.13.01

Current trade mark status Application published

Status date 2017-07-05

Opposition period start date 2017-07-05

Opposition period end date 2017-10-05

(521) Acquired distinctiveness false

(510) List of goods and services

NL

(511) Nice class number 18

09/07/2017

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NL

List of goods and services Reiskoffers en koffers.

(511) Nice class number 20

List of goods and services Opbergmeubelen; Spiegels.

(511) Nice class number 21

List of goods and services Cosmeticahouders.

(730)(731)(732)(733) Owner

Applicant identifier 687778

Name Kamal Hajiri

Organization name Kamal Hajiri

(642) Applicant legal entity Physical Person

Applicant nationality code MA

Applicant incorporation country code NL

Address country NL

Street Weteringkade 22B

City Den Haag

Postcode 2515 AP

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME-OF-DOMAINS - NAMESILO
CASE 101662

APPENDIX 03 WHOIS <https://www.whois.com> whois divastash

APPENDIX 01 TO 24

28/08/2017

Follow us

Enter a Domain Name:

LOGIN OR CREATE AN ACCOUNT

100

Get your TOP analyst
62181

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SiteLock
CodeGuard

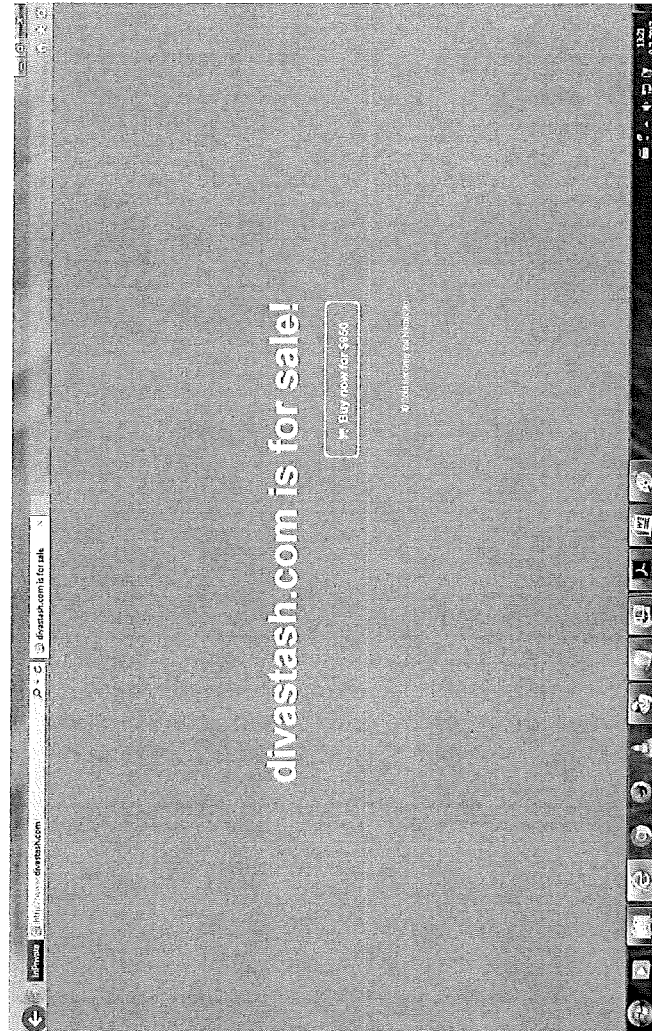
Support
View Knowledge Base
Contact Support
Report Abuse
About Whois

Backup and Recovery

APPENDIX 04 website infringement divastash

UDRP ADR KAMAL HAJRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO
CASE 101662

APPENDIX 05 website infringement by namesilo

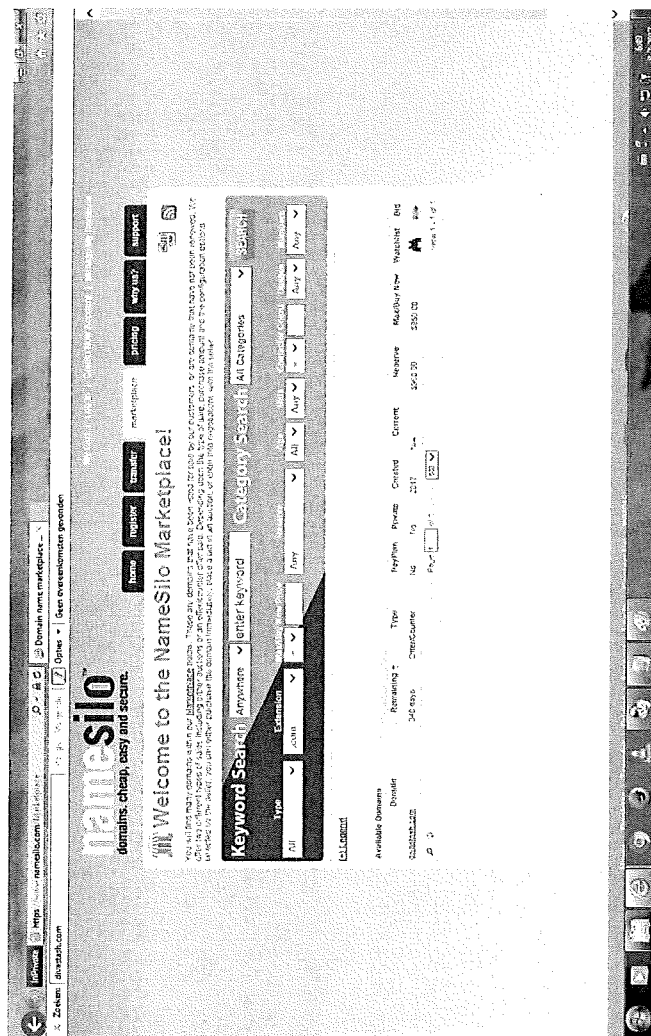


APPENDIX 01 TO 24

28/08/2017

UDRP ADR KAMAL HAJRI COMPLAINANT WWW.DIVASTASH.COM/HOME-OF-DOMAINS-NAMESILO
CASE 101662

APPENDIX 06 EUTM 016917536

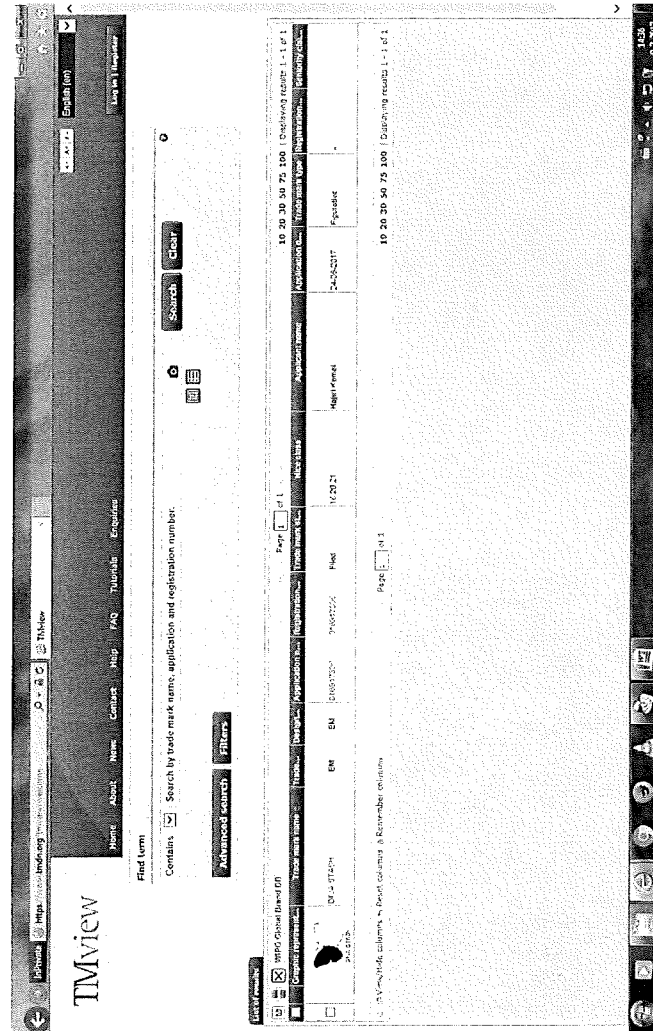


APPENDIX 01 TO 24

28/08/2017

UDRP ADR KAMAL HAJRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO
CASE 101662

APPENDIX 07 EM500000016917536



APPENDIX 01 TO 24

28/08/2017

Trade mark

DIVA STASH



DIVA STASH

(1219)(250) Application number 016917536
(1270) Application language nl
(1220) Application date 2017-06-24
Second language en
Trade mark office EUIPO - EUIPO
(1190) Registration office EM
Receiving office number E63398696
Receiving office date 2017-06-24
(1550) Trade mark type Figurative
(1551) Kind of mark Individual
(1611) Nice classification 18,20,21
(1511)(1532) Vienna classification 03.13.01
Current trade mark status Application published
Status date 2017-07-05
Opposition period start date 2017-07-05
Opposition period end date 2017-10-05
(1621) Acquired distinctiveness false
(1510) List of goods and services

NL	
(1611) Nice class number	18

NL	
List of goods and services	Reiskoffers en koffers.
(1611) Nice class number	20
List of goods and services	Opbergmeubelen; Spiegels.
(1611) Nice class number	21
List of goods and services	Cosmeticahouders.

(1730)(1731)(1732)(1733) Owner

Applicant identifier 687778
Name Kamal Hajiri
Organization name Kamal Hajiri
(1842) Applicant legal entity Physical Person
Applicant nationality code MA
Applicant incorporation country code NL
Address country NL
Address country NL
Street Weteringkade 22B
City Den Haag
Postcode 2515 AP

(1740) Representative

No entry for application number EM500000016917536

(1750) Correspondence address

(1350) Seniority

No entry for application number EM500000016917536

Exhibition priority

No entry for application number EM500000016917536

Priority

No entry for application number EM500000016917536

International registration transformation

No entry for application number EM5000000016917536

Publication

Publication number	Publication section	Publication date	Publication page
2017/125	A.1	2017-07-05	0

Opposition

No entry for application number EM5000000016917536

Recordals

No entry for application number EM5000000016917536

Appeals

No entry for application number EM5000000016917536

Renewals

No entry for application number EM5000000016917536

Trade mark events	
(50) Event date	Event description
27 - 06 - 2017	T_EXA_VALID_BASIC_FEE
27 - 06 - 2017	T_EXA_NOTIFICATION
27 - 06 - 2017	T_EXA_NOTIFICATION
27 - 06 - 2017	T_EXA_MOD_DOSSIER_MILESTONE
27 - 06 - 2017	T_EXA_VALID_CLASS_FEE
05 - 07 - 2017	T_EXA_MOD_DOSSIER_MILESTONE
24 - 06 - 2017	T_EXA_MOD_DOSSIER_MILESTONE
24 - 06 - 2017	T_EXA_PROV_FIL_DATE
28 - 06 - 2017	T_EXA_LANG_CHECK
27 - 06 - 2017	T_EXA_CLASSIFICATION
29 - 06 - 2017	T_EXA_ABS_GROUNDS
03 - 07 - 2017	T_EXA_FEES_FIN_CHECK
24 - 06 - 2017	T_EXA_KEY_IN
27 - 06 - 2017	T_EXA_COM_SEARCH
03 - 07 - 2017	T_EXA_FORM
03 - 07 - 2017	T_EXA_REQ_TRANS
03 - 07 - 2017	T_EXA_MOD_DOSSIER_MILESTONE
05 - 07 - 2017	T_EXA_PUBL_A1

Cancellation

E-mail - kamalhajiri@hotmail.com

Ynt: 2017-07-10 Hajiri_HOME OF
DOMAINS_cease_and_desist_letter

Home of Domains Home of Domains <domain@homeofdomains.com>

zo 9-7-2017 20:55

ÀÀÀ:Kamal <kamalhajiri@hotmail.com>; admin@homeofdomains.com <admin@homeofdomains.com>;

Dear Customer,

Divastash.com is for sale on NameSilo.com, 950 USD

There is no other opportunity to buy this premium name

Buy Link: www.divastash.com

Best Regards

Gönderen: Kamal <kamalhajiri@hotmail.com>
Gönderildi: 9 Temmuz 2017 Pazar 17:32:53
Kime: Home of Domains Home of Domains; Home of Domains Home of Domains;
admin@homeofdomains.com
Könu: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

CEASE & DESIST DEMAND

Kamal Hajiri
Weteringkade 22B
2515 AP 's Gravenhage
THE NETHERLANDS
kamalhajiri@hotmail.com

July 10, 2017

Via E-mail and Letter Mail

HOME OF DOMAINS
1928 E. Highland Avenue, Ste F104 PMB# 255
Phoenix, AZ 85016

Dear Sirs,

I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark 'DIVA STASH®'. As such, I write because you are infringing on my trademark and causing me damage by cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is the same or similar to a trademark that is owned by someone else.

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith intent to profit from another's mark and the domain name is confusingly similar to my registered

https://outlook.live.com/owa/?path=/mail/inbox/rp

9-7-2017

mark. Infringement only for profit purposes and damages the goodwill of the registered mark that result in the loss of the rights to the market.

Your registration (and use) and offering for sale of the domain name 'www.divastash.com' also constitutes cyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad faith, registers a domain name that is identical or confusingly similar to the trademark of another person can be held liable for damages – up to \$100,000 per domain. 15 U.S.C. § 1117(d).

In short, I consider this to be a very serious matter and I will take all necessary and appropriate actions to bring an immediate halt to your blatant and unauthorized use of this trademark. In the interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer you the one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be received no later than July 15, 2017, that:

- i. you have immediately ceased all trademark infringement; and
- ii. you agree not to associate 'DIVA STASH®' with you or your commercial activities in any way, at any point in the future; and
- iii. you will immediately transfer your infringing Domain Name to me

If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

Kamal Hajiri

APPENDIX I_https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement 'DIVA STASH®',

APPENDIX III website infringement 'DIVA STASH®', by namesilo

APPENDIX IV EUTM 016917536

APPENDIX V EM500000016917536

APPENDIX I_https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement divastash.jpg

APPENDIX II website infringement 'DIVA STASH'⁶⁵

APPENDIX II website infringement divastash.jpg

APPENDIX IV EUTM 016917536

APPENDIX II website infringement divastash.jpg

APPENDIX III website infringement 'DIVA STASH'⁶⁶, by namesilo

APPENDIX V EM500000016917536

09/07/2017
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Trade mark
DIVA STASH
(110)/(140) Application number 016917536
(120) Application language nl
(220) Application date 2017-06-24
Second language en
Trade mark office EUIPO - EUIPO
(390) Registration office EM
Receiving office number E63398696
Receiving office date 2017-06-24
(580) Trade mark type Figurative
(591) Kind of mark Individual
(511) Nice classification 18,20,21
(531)/(532) Vienna classification 03.13.01
Current trade mark status Application published
Status date 2017-07-05
Opposition period start date 2017-07-05
Opposition period end date 2017-10-05
(521) Acquired distinctiveness false
(510) List of goods and services
NL
(511) Nice class number 18
09/07/2017
2 / 4
NL
List of goods and services Reiskoffers en koffers.
(511) Nice class number 20
List of goods and services Opbergmeubelen; Spiegels.
(511) Nice class number 21
List of goods and services Cosmethouders.
(130)/(131)/(132)/(133) Owner
Applicant identifier 687778
Name Kamal Hajiri
Organization name Kamal Hajiri
(542) Applicant legal entity Physical Person
Applicant nationality code MA
Applicant incorporation country code NL
Address country NL
Address country NL
Street Weteringkade 22B
City Den Haag
Postcode 2515 AP

(140) Representative
No entry for application number EM500000016917536
(150) Correspondence address
(160) Seniority
No entry for application number EM500000016917536
Exhibition priority
No entry for application number EM500000016917536
Priority
No entry for application number EM500000016917536
International registration transformation
09/07/2017
3 / 4
No entry for application number EM500000016917536
Publication
Publication number Publication section Publication date Publication page
2017/125 A.1 2017-07-05 0
Opposition
No entry for application number EM500000016917536
Records
Trade mark events
(180) Event date Event description
27-06-2017 T_EXA_VALID_BASIC_FEE
27-06-2017 T_EXA_NOTIFICATION
27-06-2017 T_EXA_NOTIFICATION
27-06-2017 T_EXA_MOD_DOSSIER_MILESTONE
27-06-2017 T_EXA_VALID_CLASS_FEE
05-07-2017 T_EXA_MOD_DOSSIER_MILESTONE
24-06-2017 T_EXA_MOD_DOSSIER_MILESTONE
24-06-2017 T_EXA_PROV_FIL_DATE
28-06-2017 T_EXA_LANG_CHECK
27-06-2017 T_EXA_CLASSIFICATION
29-06-2017 T_EXA_ABS_GROUNDS
03-07-2017 T_EXA_FEES_FIN_CHECK
24-06-2017 T_EXA_KEY_IN
27-06-2017 T_EXA_COM_SEARCH
03-07-2017 T_EXA_FORM
03-07-2017 T_EXA_REQ_TRANS
03-07-2017 T_EXA_MOD_DOSSIER_MILESTONE
05-07-2017 T_EXA_PUBL_AI
Cancellation
09/07/2017
4 / 4
No entry for application number EM500000016917536
Appeals
No entry for application number EM500000016917536
Renewals
No entry for application number EM500000016917536

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME/OF/DOMAINS-NAMESILO
CASE 101662

APPENDIX 09 EMAIL CORRESPONDANCE NAMESILO REPORT ABUSE

28/08/2017

APPENDIX 01 TO 24

2017-07-10 Hajiri_NAMESILO_cease_and_desist_letter

Kamal

zo 9-7-2017 16:00

Anabuse@namesilo.com <abuse@namesilo.com>;

Urgente: Hoog

6 bijlagen (2 MB)

2017-07-10Hajiri_NAMESILO_cease_and_desist_letter.pdf; APPENDIX I_https www.whois.com whois divastash.com; APPENDIX II website infringement divastash.jpg; APPENDIX III website infringement by namesilo.jpg; APPENDIX IV EUTM 016917536.jpg; APPENDIX V EM500000016917536.pdf;

CEASE & DESIST DEMAND

Kamal Hajiri
Weteringkade 22B
2515 AP 's Gravenhage
THE NETHERLANDS
kamalhajiri@hotmail.com

July 10, 2017

Via E-mail and Letter Mail
NAMESILO
1300 E. Missouri Avenue
Suite A-110
Phoenix, AZ 85014

Dear Mr. Goldfarb,

I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark 'DIVA STASH®'. As such, I write because you are infringing on my trademark and causing me damage by cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is the same or similar to a trademark that is owned by someone else.

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith intent to profit from another's mark and the domain name is confusingly similar to my registered mark. Infringement only for profit purposes and damages the goodwill of the registered mark that result in the loss of the rights to the market.

Your registration (and use) and offering for sale of the domain name 'www.divastash.com' also constitutes cyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad faith, registers a domain name that is identical or confusingly similar to the trademark of another person can be held liable for damages – up to \$100,000 per domain. 15 U.S.C. § 1117(d).

In short, I consider this to be a very serious matter and I will take all necessary and appropriate actions to bring an immediate halt to your blatant and unauthorized use of this trademark. In the interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer you the one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be received no later than July 15, 2017, that:

- you have immediately ceased all trademark infringement; and
- you agree not to associate 'DIVA STASH®' with you or your commercial activities in any way, at any point in the future; and
- you will immediately transfer your infringing Domain Name to me

If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

Kamal Hajiri

APPENDIX I_https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement 'DIVA STASH®'

APPENDIX III website infringement 'DIVA STASH®' by namesilo

APPENDIX IV EUTM 016917536

APPENDIX V EM500000016917536

APPENDIX I_https www.whois.com whois 'www.divastash.com'

E-mail - kamalhajiri@hotmail.com

pagina 3 van 9

E-mail - kamalhajiri@hotmail.com

pagina 4 van 9

APPENDIX II website infringement 'DIVA STASH'[®],

APPENDIX II website infringement divastash.jpg

APPENDIX III website infringement 'DIVA STASH'[®], by namesilo

<https://outlook.live.com/owa/?path=/mail/sentitems/rp>

27-8-2017

<https://outlook.live.com/owa/?path=/mail/sentitems/rp>

27-8-2017

APPENDIX II website infringement divastash.jpg

APPENDIX V EM5000000016917536

09/07/2017
1 / 4
Trade mark
DIVA STASH
(119)(240) Application number 016917536
(270) Application language nl
(220) Application date 2017-06-24
Second language en
Trade mark office EUIPO - EUIPO
(190) Registration office EM
Receiving office number E63398696
Receiving office date 2017-06-24
(550) Trade mark type Figurative
(551) Kind of mark Individual
(511) Nice classification 18,20,21
(531)(532) Vienna classification 03.13.01
Current trade mark status Application published
Status date 2017-07-05
Opposition period start date 2017-07-05
Opposition period end date 2017-10-05
(521) Acquired distinctiveness false
(510) List of goods and services
NL
(511) Nice class number 18
09/07/2017
2 / 4
NL
List of goods and services Reiskoffers en koffers.
(511) Nice class number 20
List of goods and services Opbergmeubelen; Spiegels.
(511) Nice class number 21
List of goods and services Cosmeticahouders.
(130)(731)(732)(733) **Owner**
Applicant identifier 687778
Name Kamal Hajiri
Organization name Kamal Hajiri
(542) Applicant legal entity Physical Person
Applicant nationality code MA
Applicant incorporation country code NL
Address country NL
Address country NL
Street Weteringkade 22B
City Den Haag

APPENDIX IV EUTM 016917536

APPENDIX II website infringement divastash.jpg

Postcode 2515 AP
(740) **Representative**
No entry for application number EM5000000016917536
(750) Correspondence address
(350) **Seniority**
No entry for application number EM5000000016917536
Exhibition priority
No entry for application number EM5000000016917536
Priority
No entry for application number EM5000000016917536
International registration transformation
09/07/2017
3 / 4
No entry for application number EM5000000016917536
Publication
Publication number Publication section Publication date Publication page
2017/125 A.1 2017-07-05 0
Opposition
No entry for application number EM5000000016917536
Records
Trade mark events
(850) Event date Event description
27 - 06 - 2017 T_EXA_VALID_BASIC_FEE
27 - 06 - 2017 T_EXA_NOTIFICATION
27 - 06 - 2017 T_EXA_NOTIFICATION
27 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
27 - 06 - 2017 T_EXA_VALID_CLASS_FEE
05 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
24 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
24 - 06 - 2017 T_EXA_PROV_FIL_DATE
28 - 06 - 2017 T_EXA_LANG_CHECK
27 - 06 - 2017 T_EXA_CLASSIFICATION
29 - 06 - 2017 T_EXA_ABS_GROUNDS
03 - 07 - 2017 T_EXA_FEES_FIN_CHECK
24 - 06 - 2017 T_EXA_KEY_IN
27 - 06 - 2017 T_EXA_COM_SEARCH
03 - 07 - 2017 T_EXA_FORM
03 - 07 - 2017 T_EXA_REQ_TRANS
03 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
05 - 07 - 2017 T_EXA_PUBL_A1
Cancellation
09/07/2017
4 / 4
No entry for application number EM5000000016917536
Appeals
No entry for application number EM5000000016917536
Renewals
No entry for application number EM5000000016917536

E-mail - kamalhajiri@hotmail.com

pagina 9 van 9

UDRP ADR KAMAL HAJRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO
CASE 101662

APPENDIX 10 EMAIL CORRESPONDANCE NAMESILO 01

APPENDIX 01 TO 24 28/08/2017

<https://outlook.live.com/owa/?path=/mail/sentitems/tp>

27-8-2017

E-mail - kamalhajiri@hotmail.com

pagina 1 van 9

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME_OF_DOMAINS - NAMESILO
CASE 101662

RESELLER PROBLEM - 2017-07-10 Hajiri_HOME OF
DOMAINS_cease_and_desist_letter

Kamal

di 11-7-2017 18:35

Aan: support@namesilo.com <support@namesilo.com>;

Urgentie: Hoog

5 bijlagen (1 MB)

APPENDIX I, <https://www.whois.com/whois/divastash.pdf>; APPENDIX II website infringement divastash.jpg; APPENDIX III
website infringement by namesilo.jpg; APPENDIX IV EUTM 016917536.jpg; APPENDIX V EM500000016917536.pdf;

APPENDIX 11 EMAIL CORRESPONDANCE NAMESILO 02

Dear Sirs,

Can you confirm receipt of my letter, please?

Kindest Regards,

Kamal Hajiri

Van: Home of Domains Home of Domains <domain@homeofdomains.com>
Verzonden: zondag 9 juli 2017 20:55
Aan: Kamal; admin@homeofdomains.com
Onderwerp: Ynt: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

Dear Customer,

Divastash.com is for sale on NameSilo.com, 950 USD

There is no other opportunity to buy this premium name

Buy Link: www.divastash.com

Best Regards

APPENDIX 01 TO 24

28/08/2017

<https://outlook.live.com/owa/?path=/mail/sentitems/rp>

12-7-2017

E-mail - kamalhajiri@hotmail.com

pagina 1 van 9

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME-OF-DOMAINS-NAMESILO
CASE 101662

RESELLER PROBLEM

Kamal

di 11-7-2017 00:58

Aan: support@namesilo.com <support@namesilo.com>;

Urgentie: Hoog

1 bijlagen (204 KB)

Antw_HOD_2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter.pdf

APPENDIX 12 CHAT namesilo

Dear Sirs,

I have tried to reach online support by telephone but when I call nobody answers. You can't also leave a voicemail message.

Can you please take immediately action. Thank you very much for your help.

Best Regards,

Kamal Hajiri

Van: Kamal <kamalhajiri@hotmail.com>
Verzonden: dinsdag 11 juli 2017 00:38
Aan: support@namesilo.com
Onderwerp: RESELLER PROBLEM

Dear Sirs,

Can You PLEASE confirm that you have received my complaint.

APPENDIX 01 TO 24

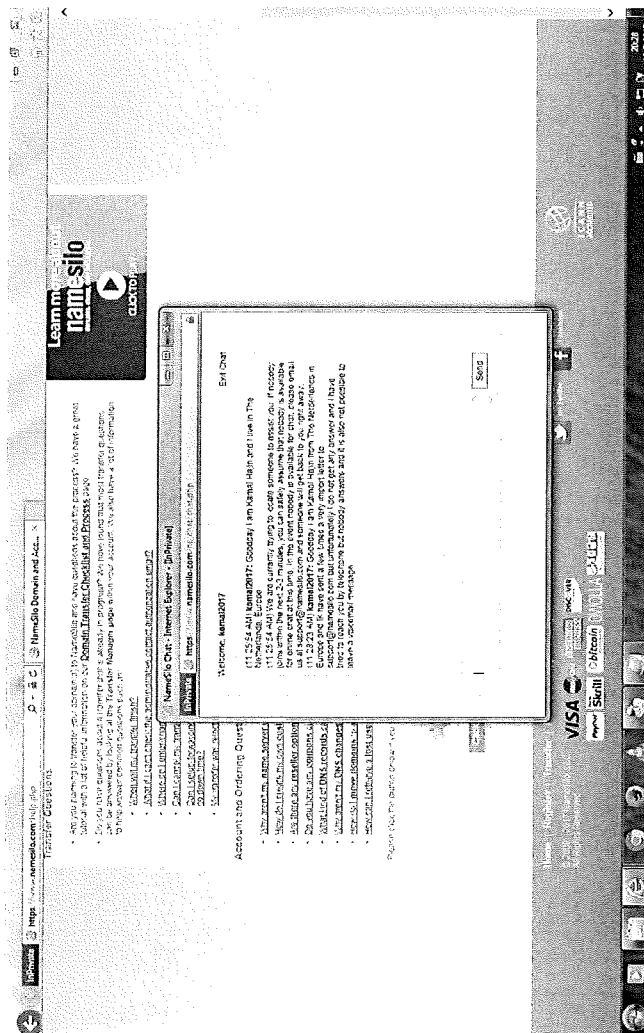
28/08/2017

<https://outlook.live.com/owa/?path=/mail/sentitems/rp>

12-7-2017

UDRP ADR KAMAL HAJRI COMPLAINT WWW.DIVASTASH.COM/HOME/OF/DOMAINS-NAMESILO
CASE 101662

APPENDIX 13 EMAIL CORRESPONDANCE C&D LETTER HOD



APPENDIX 01 TO 24

28/08/2017

E-mail - kamalhajiri@hotmail.com

pagina 1 van 8

E-mail - kamalhajiri@hotmail.com

pagina 2 van 8

2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

Kamal

di 11-7-2017 20:46

aandomain@homeofdomains.com <domain@homeofdomains.com>:

Urgentie Hoog

6 bijlagen (2 MB)

2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter.pdf; APPENDIX I_https www.whois.com whois divastash.pdf; APPENDIX II website infringement divastash.jpg; APPENDIX III website infringement by namesilo.jpg; APPENDIX IV EUTM 016917536.jpg; APPENDIX V EM500000016917536.pdf;

Van: Kamal <kamalhajiri@hotmail.com>

Verzonden: zondag 9 juli 2017 16:32

Aan: domain@homeofdomains.com; domain@homeofdomains.com; admin@homeofdomains.com

Onderwerp: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

CEASE & DESIST DEMAND

Kamal Hajiri

Weteringkade 22B

2515 AP 's Gravenhage

THE NETHERLANDS

kamalhajiri@hotmail.com

Via E-mail and Letter Mail

HOME OF DOMAINS

1928 E. Highland Avenue. Ste F104 PMB# 255

Phoenix, AZ 85016

July 10, 2017

Dear Sirs,

I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark 'DIVA STASH®'. As such, I write because you are infringing on my trademark and causing me damage by cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is the same or similar to a trademark that is owned by someone else.

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith intent to profit from another's mark and the domain name is confusingly similar to my registered

https://outlook.live.com/owa/?path=/mail/sentitems/rp

12-7-2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

12-7-2017

mark. Infringement only for profit purposes and damages the goodwill of the registered mark that result in the loss of the rights to the market.

Your registration (and use) and offering for sale of the domain name 'www.divastash.com' also constitutes cyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad faith, registers a domain name that is identical or confusingly similar to the trademark of another person can be held liable for damages – up to \$100,000 per domain. 15 U.S.C. § 1117(d).

In short, I consider this to be a very serious matter and I will take all necessary and appropriate actions to bring an immediate halt to your blatant and unauthorized use of this trademark. In the interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer you the one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be received no later than July 15, 2017, that:

- i. you have immediately ceased all trademark infringement; and
- ii. you agree not to associate 'DIVA STASH®' with you or your commercial activities in any way, at any point in the future; and
- iii. you will immediately transfer your infringing Domain Name to me

If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

Kamal Hajiri

APPENDIX I_https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement 'DIVA STASH®',

APPENDIX III website infringement 'DIVA STASH®', by namesilo

APPENDIX IV EUTM 016917536

APPENDIX V EM500000016917536

APPENDIX I_https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement 'DIVA STASH'[®],

APPENDIX II website infringement divastash.jpg

APPENDIX III website infringement 'DIVA STASH'[®] by namesilo

APPENDIX II website infringement divastash.jpg

APPENDIX V EM500000016917536

09/07/2017
1 / 4
Trade mark
DIVA STASH
(219)/(250) Application number 016917536
(270) Application language nl
(220) Application date 2017-06-24
Second language en
Trade mark office EUIPO - EUIPO
(390) Registration office EM
Receiving office number E63398696
Receiving office date 2017-06-24
(550) Trade mark type Figurative
(551) Kind of mark Individual
(511) Nice classification 18,20,21
(531)/(532) Vienna classification 03.13.01
Current trade mark status Application published
Status date 2017-07-05
Opposition period start date 2017-07-05
Opposition period end date 2017-10-05
(521) Acquired distinctiveness false
(510) List of goods and services
NL
(511) Nice class number 18
09/07/2017
2 / 4
NL
List of goods and services Reiskoffers en koffers.
(511) Nice class number 20
List of goods and services Opbergmeubelen; Spiegels.
(511) Nice class number 21
List of goods and services Cosmeticahouders.
(750)/(731)/(732)/(733) Owner
Applicant identifier 687778
Name Kamal Hajiri
Organization name Kamal Hajiri
(64) Applicant legal entity Physical Person
Applicant nationality code MA
Applicant incorporation country code NL
Address country NL
Address country NL
Street Weteringkade 22B
City Den Haag
Postcode 2515 AP

APPENDIX II website infringement divastash.jpg

APPENDIX IV EUTM 016917536

E-mail - kamalhajiri@hotmail.com

pagina 7 van 8

E-mail - kamalhajiri@hotmail.com

pagina 8 van 8

(740) **Representative**
No entry for application number EM5000000016917536
(750) **Correspondence address**
(450) **Seniority**
No entry for application number EM5000000016917536
Exhibition priority
No entry for application number EM5000000016917536
Priority
No entry for application number EM5000000016917536
International registration transformation
09/07/2017
3 / 4
No entry for application number EM5000000016917536
Publication
Publication number Publication section Publication date Publication page
2017/125 A.1 2017-07-05 0
Opposition
No entry for application number EM5000000016917536
Records
Trade mark events
(650) **Event date Event description**
27 - 06 - 2017 T_EXA_VALID_BASIC_FEE
27 - 06 - 2017 T_EXA_NOTIFICATION
27 - 06 - 2017 T_EXA_NOTIFICATION
27 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
27 - 06 - 2017 T_EXA_VALID_CLASS_FEE
05 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
24 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
24 - 06 - 2017 T_EXA_PROV_FIL_DATE
28 - 06 - 2017 T_EXA_LANG_CHECK
27 - 06 - 2017 T_EXA_CLASSIFICATION
29 - 06 - 2017 T_EXA_ABS_GROUNDS
03 - 07 - 2017 T_EXA_FEES_FIN_CHECK
24 - 06 - 2017 T_EXA_KEY_IN
27 - 06 - 2017 T_EXA_COM_SEARCH
03 - 07 - 2017 T_EXA_FORM
03 - 07 - 2017 T_EXA_REQ_TRANS
03 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE
05 - 07 - 2017 T_EXA_PUBL_A1
Cancellation
09/07/2017
4 / 4
No entry for application number EM5000000016917536
Appeals
No entry for application number EM5000000016917536
Renewals
No entry for application number EM5000000016917536

RESELLER PROBLEM 2017-07-10 Hajiri_HOME OF
DOMAINS_cease_and_desist_letter

Kamal

wo 12-7-2017 10:15

Aan:goldfab@namesilo.com <goldfab@namesilo.com>;

Urgentie: Hoog

6 bijlagen (2 MB)

2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter.pdf; APPENDIX I_https www.whois.com whois
divastash.pdf; APPENDIX II website infringement divastash.jpg; APPENDIX III website infringement by namesilo.jpg;
APPENDIX IV EUTM 016917536.jpg; APPENDIX V EM500000016917536.pdf;

Van: Kamal <kamalhajiri@hotmail.com>

Verzonden: dinsdag 11 juli 2017 20:46

Aan: domain@homeofdomains.com

Onderwerp: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

Van: Kamal <kamalhajiri@hotmail.com>

Verzonden: zondag 9 juli 2017 16:32

Aan: domain@homeofdomains.com; domain@homeofdomains.com; admin@homeofdomains.com

Onderwerp: 2017-07-10 Hajiri_HOME OF DOMAINS_cease_and_desist_letter

CEASE & DESIST DEMAND

Kamal Hajiri

Weteringkade 22B

2515 AP 's Gravenhage

THE NETHERLANDS

kamalhajiri@hotmail.com

Via E-mail and Letter Mail

HOME OF DOMAINS

1928 E. Highland Avenue, Ste F104 PMB# 255

Phoenix, AZ 85016

July 10, 2017

E-mail - kamalhajiri@hotmail.com

pagina 2 van 9

E-mail - kamalhajiri@hotmail.com

pagina 3 van 9

Dear Sirs,

I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark 'DIVA STASH®'. As such, I write because you are infringing on my trademark and causing me damage by cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is the same or similar to a trademark that is owned by someone else.

The registration and using of the domain name 'www.divastash.com' can be marked as a bad faith intent to profit from another's mark and the domain name is confusingly similar to my registered mark. Infringement only for profit purposes and damages the goodwill of the registered mark that result in the loss of the rights to the market.

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- i. you have immediately ceased all trademark infringement; and
- ii. you agree not to associate 'DIVA STASH®' with you or your commercial activities in any way, at any point in the future; and
- iii. you will immediately transfer your infringing Domain Name to me

If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

Kamal Hajiri

APPENDIX I_https www.whois.com whois 'www.divastash.com'

APPENDIX II website infringement 'DIVA STASH®'

APPENDIX III website infringement 'DIVA STASH®', by namesilo

APPENDIX IV EUTM 016917536

APPENDIX V EM50000016917536

APPENDIX I_https www.whois.com whois 'www.divastash.com'

https://outlook.live.com/owa/?path=/mail/sentitems/rp

12-7-2017

https://outlook.live.com/owa/?path=/mail/sentitems/rp

12-7-2017

APPENDIX II website infringement 'DIVA STASH'[®]

APPENDIX II website infringement divastash.jpg

APPENDIX III website infringement 'DIVA STASH'[®] by namesilo

APPENDIX II website infringement divastash.jpg

APPENDIX V EM500000016917536

09/07/2017
1 / 4
Trade mark
DIVA STASH
(210)/(260) Application number 016917536
(270) Application language nl
(220) Application date 2017-06-24
Second language en
Trade mark office EUIPO - EUIPO
(390) Registration office EM
Receiving office number E63398696
Receiving office date 2017-06-24
(650) Trade mark type Figurative
(651) Kind of mark Individual
(511) Nice classification 18,20,21
(531)/(532) Vienna classification 03.13.01
Current trade mark status Application published
Status date 2017-07-05
Opposition period start date 2017-07-05
Opposition period end date 2017-10-05
(621) Acquired distinctiveness false
(510) List of goods and services
NL
(511) Nice class number 18
09/07/2017
2 / 4
NL
List of goods and services Reiskoffers en koffers.
(511) Nice class number 20
List of goods and services Opbergmeubelen; Spiegels.
(511) Nice class number 21
List of goods and services Cosmeticahouders.
(730)/(731)/(732)/(733) Owner
Applicant identifier 687778
Name Kamal Hajiri
Organization name Kamal Hajiri
(640) Applicant legal entity Physical Person
Applicant nationality code MA
Applicant incorporation country code NL
Address country NL
Address country NL
Street Weteringkade 22B
City Den Haag
Postcode 2515 AP

APPENDIX II website infringement divastash.jpg

APPENDIX IV EUTM 016917536

(740) Representative

No entry for application number EM5000000016917536

(750) Correspondence address

(750) Seniority

No entry for application number EM5000000016917536

Exhibition priority

No entry for application number EM5000000016917536

Priority

No entry for application number EM5000000016917536

International registration transformation

09/07/2017

3 / 4

No entry for application number EM5000000016917536

Publication

Publication number Publication section Publication date Publication page

2017/125 A.1 2017-07-05 0

Opposition

No entry for application number EM5000000016917536

Records

Trade mark events

(580) Event date Event description

27 - 06 - 2017 T_EXA_VALID_BASIC_FEE

27 - 06 - 2017 T_EXA_NOTIFICATION

27 - 06 - 2017 T_EXA_NOTIFICATION

27 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE

27 - 06 - 2017 T_EXA_VALID_CLASS_FEE

05 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE

24 - 06 - 2017 T_EXA_MOD_DOSSIER_MILESTONE

24 - 06 - 2017 T_EXA_PROV_FIL_DATE

28 - 06 - 2017 T_EXA_LANG_CHECK

27 - 06 - 2017 T_EXA_CLASSIFICATION

29 - 06 - 2017 T_EXA_ABS_GROUNDS

03 - 07 - 2017 T_EXA_FEES_FIN_CHECK

24 - 06 - 2017 T_EXA_KEY_IN

27 - 06 - 2017 T_EXA_COM_SEARCH

03 - 07 - 2017 T_EXA_FORM

03 - 07 - 2017 T_EXA_REQ_TRANS

03 - 07 - 2017 T_EXA_MOD_DOSSIER_MILESTONE

05 - 07 - 2017 T_EXA_PUBL_A1

Cancellation

09/07/2017

4 / 4

No entry for application number EM5000000016917536

Appeals

No entry for application number EM5000000016917536

Renewals

No entry for application number EM5000000016917536

APPENDIX 15 REGISTERED MAIL C&D LETTER NAMESILO

CEASE & DESIST DEMAND

Kamal Hajiri
Weterinkade 22B
2515 AP 's Gravenhage
THE NETHERLANDS
kamalhajiri@hotmail.com

Via E-mail and Registered Mail
NAMESILO
1300 E. Missouri Avenue
Suite A-110
Phoenix, AZ 85014

Dear Mr. Goldfarb,

I am Kamal Hajiri, owner of several registered patents, copyrights and the trademark "DIVA STASH". As such, I write because you are infringing on my trademark and causing me damage by cyber squatting. Cyber squatting is when a person registers or uses a domain name in bad faith that is the same or similar to a trademark that is owned by someone else.

The registration and using of the domain name "www.divastash.com" can be marked as a bad faith intent to profit from another's mark and the domain name is confusingly similar to my registered mark. Infringement only for profit purposes and damages the goodwill of the registered mark that result in the loss of the rights to the market.

Your registration (and use) and offering for sale of the domain name "www.divastash.com" also constitutes cyber-piracy in violation of the U.S. Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d). Like the Lanham Act, under Anti-Cybersquatting Act, any person who, in bad faith, registers a domain name that is identical or confusingly similar to the trademark of another person can be held liable for damages – up to \$100,000 per domain. 15 U.S.C. § 1117(d).

In short, I consider this to be a very serious matter and I will take all necessary and appropriate actions to bring an immediate halt to your blatant and unauthorized use of this trademark. In the interest of avoiding what will certainly be a costly litigation process for you, we are prepared to offer you the one-time opportunity to rectify this matter by providing us with your prompt written assurances, to be received no later than July 23, 2017, that:

- (i) you have immediately ceased all trademark infringement; and
- (ii) you agree not to associate "DIVA STASH" with you or your commercial activities in any way, at any point in the future; and
- (iii) you will immediately transfer your infringing Domain Name to me

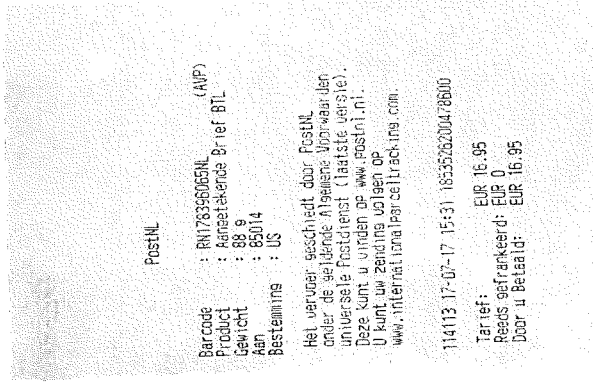
If I do not receive these assurances by the aforesaid date, we will pursue all remedies available at law or in equity against you. I look forward to your prompt written response.

Very truly yours,

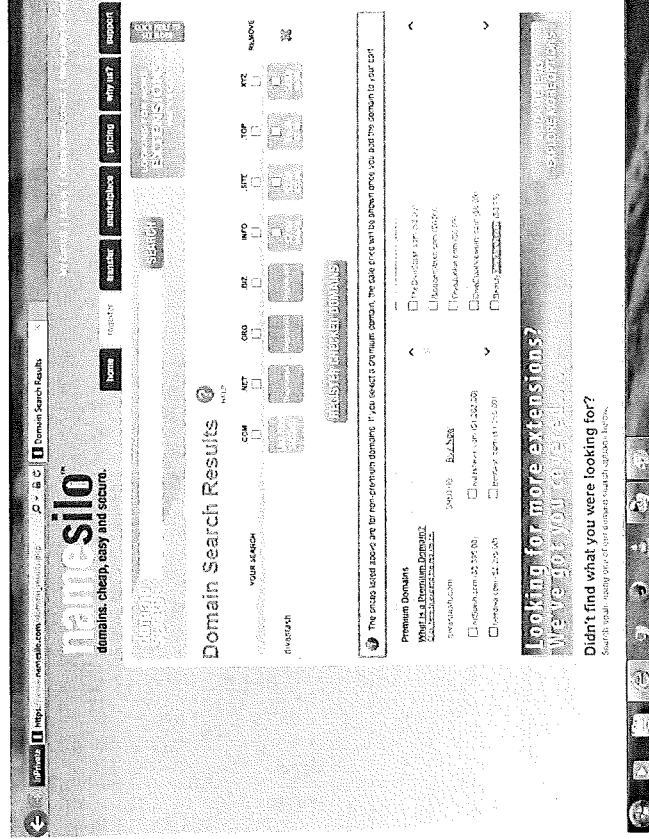
Kamal Hajiri

APPENDIX I <https://www.whois.com/whois/www.divastash.com>
APPENDIX II website infringement "DIVA STASH"
APPENDIX III website infringement "DIVA STASH" by namesilo
APPENDIX IV EUTM 016917536
APPENDIX V EN50000016917536

APPENDIX 16 RECEIPT REGISTERED MAIL C&D LETTER NAMESILO

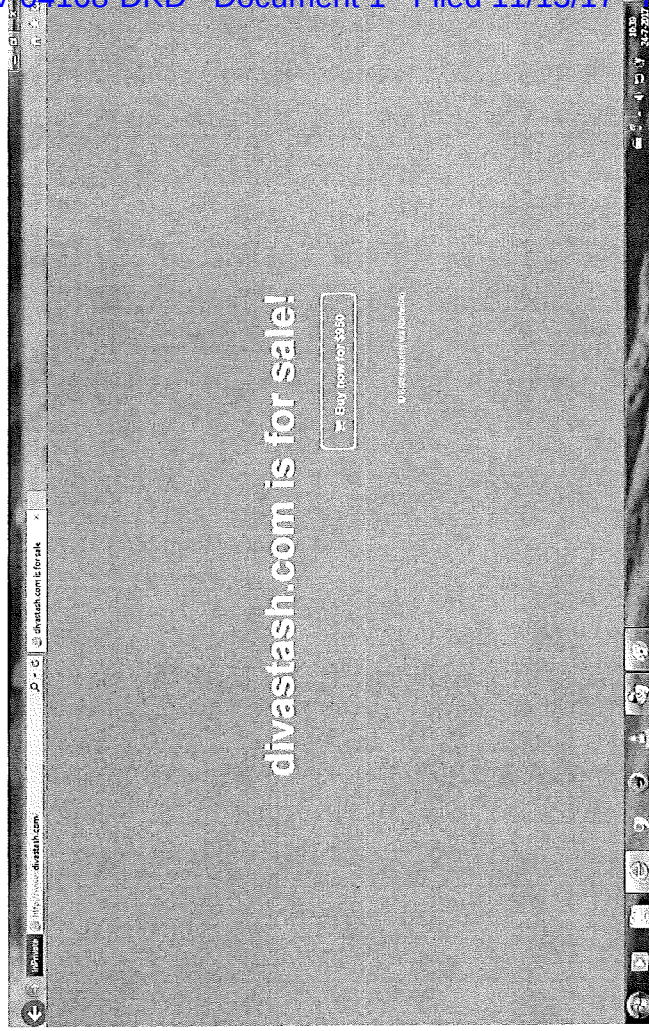


APPENDIX 17 website infringement by namesilo



UDRP ADR KAMAL HAJRI COMPLAINANT WWW.DIVASTASH.COM/HOME-OF-DOMAINS-NAMESILO
CASE 101662

APPENDIX 18 website infringement divastash




APPENDIX 01 TO 24


28/08/2017

APPENDIX 19 RECEIPT REGISTER MAIL C&D LETTER NAMESILO
RECEIVED


Tracking status




Verzend-
informatie
ontvangen




In transit



Aangekomen
in land van
bestemming



Onderweg
met
pakketten-
chauffeur



Afgeleverd

Afgeleverd

vr 18 aug. 11:47

Pakketdetails

Barcode

Referentie

Ontvanger

RN178396065NL

RN178396065NL

85014

Verzenddatum

Verenigde-Statien

ma 17 jul. 15:34

APPENDIX 01 TO 24

28/08/2017

Tracking gebeurtenissen

Datum	Tijd	Plaats	Status
vr 18 aug	11:47		Zending is bezorgd
za 12 aug	20:03		Zending in sorteercentrum buitenland
di 18 jul	02:21	NL	Klaar voor transport naar buitenland
ma 17 jul	21:01	NL	Zending is bij PostNL
ma 17 jul	15:34	NL	Zending is bij PostNL
ma 17 jul	15:32		Zending wordt verwacht, maar zit nog niet in sorteerproces

APPENDIX 20 NAMESILO Reseller Complaint & Policies

silo™

domains. cheap, easy and secure.

[My Cart](#) | [Log In](#) | [Create New Account](#) | [Manage My Domains](#)

Support Home :: Policies :: Reseller Complaints and Policies

Reseller Complaints and Policies

If you have a domain that was registered via one of our resellers' partners, or is an account you do not control, and the account holder is unresponsive, please follow the steps listed below.

- Verify that the domain name is registered with NameSilo. You can up this via a [WHOIS search](#).
- Send an email to the reseller and copy us at support@namesilo.com.
- If the reseller does not reply to you within 72 hours, forward the original email to us at the same email address with the subject of "Reseller Problem".
- We will then attempt to contact the reseller on your behalf. If they do not reply to us or are unwilling to help resolve the dispute, we may work with you to transfer the domain to an account you control.
- We will reply to you and ask that you create an account on our system and mail us with this username you created. We will then mail you receive a valid government-issued identification card featuring the name found in WHOIS for this domain.

Other Reseller Topics

- We will not get involved in any payment disputes with resellers. You will need to address any such issues directly with the reseller.
- We will not pay for the steps listed above. Please be sure to follow the steps exactly to ensure the fastest result.
- We will not make any charges to domains during the process listed above. We understand some charges are important to make outside, but we must follow the steps listed above and allow adequate time for the reseller to respond.
- If your information does not appear in WHOIS four days after steps is likely not sufficient we can do to resolve your issue.

[home](#) [register](#) [transfer](#) [markplace](#) [pricing](#) [why us?](#) [support](#)

Why choose NameSilo?

cheap

easy

secure

tools

Learn more about main-silo™

click to play

Home | [Register](#) | [Transfer](#) | [Pricing](#) | [Support](#) | [Log In](#) | [Contact Us](#) | [WHOS](#)

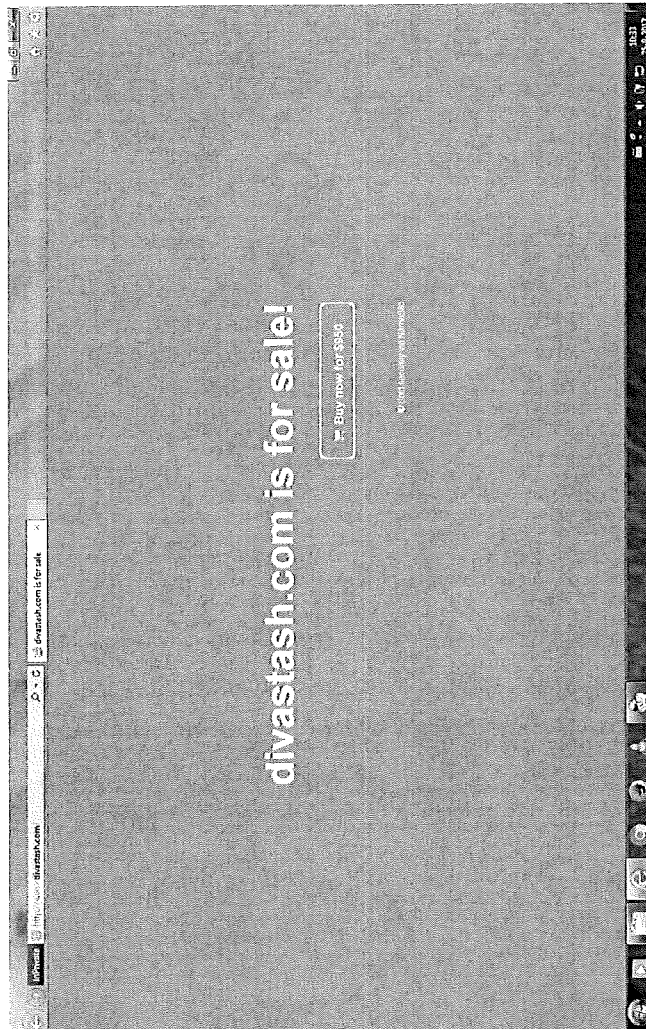
© 2006 - 2017 NameSilo LLC
All Rights Reserved

Follow us on Twitter

APPENDIX 21 website infringement divastash

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME-OF-DOMAINS-NAMESILO
CASE 101662

APPENDIX 22 website infringement by namesilo

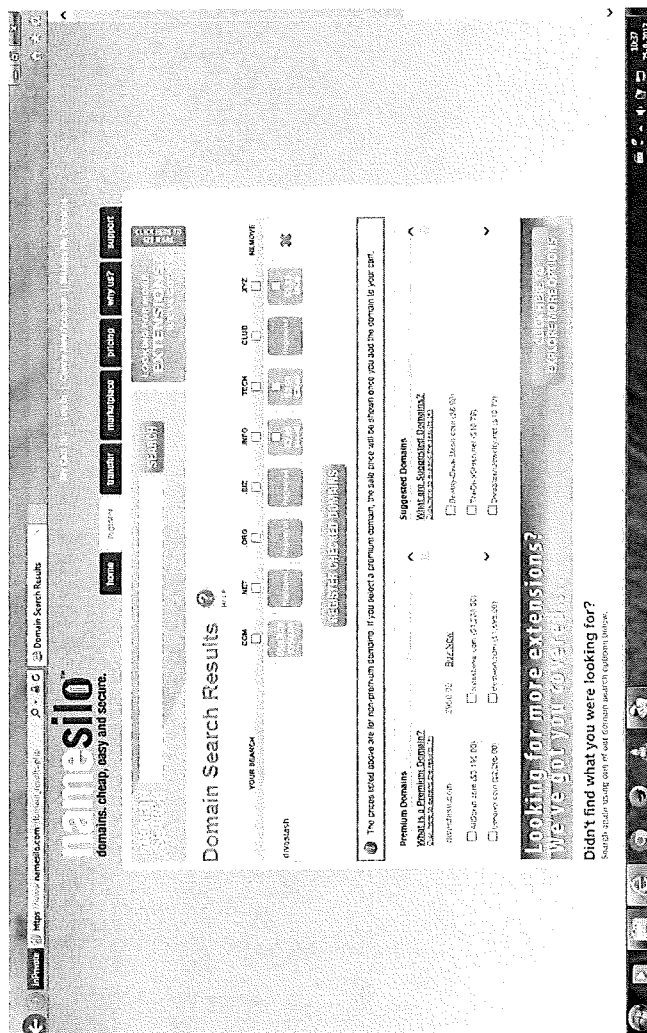


APPENDIX 01 TO 24

28/08/2017

UDRP ADR KAMAL HAJRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO
CASE 101662

APPENDIX 23 27082017_HAJRI_EUIPO_dsv-result-list

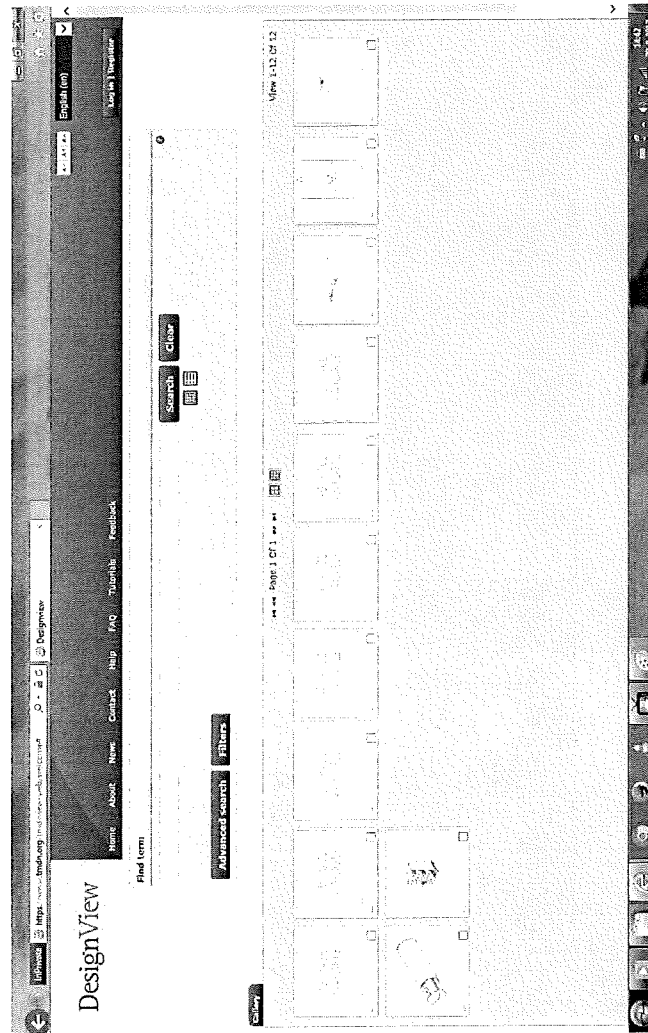


APPENDIX 01 TO 24

28/08/2017

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME-OF-DOMAINS-NAMESILO
CASE 101662

APPENDIX 24 27082017_HAJIRI_EUIPO_dsv-result-list



APPENDIX 01 TO 24

28/08/2017


Find term anm:hajiri	NO IMAGE AVAILABLE	Design office	EM
		Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,CY,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
	NO IMAGE AVAILABLE	Indication of the product	undefined
		Verbal element	-
	NO IMAGE AVAILABLE	Application number	003081686
		Design number	003081686-0001
	NO IMAGE AVAILABLE	Registration number	003081686-0001
		Design status	Registered
	NO IMAGE AVAILABLE	Owner name	HAIJIRI
		Previous owner name	-
	NO IMAGE AVAILABLE	Representative's name	-
		Designer name	-
	NO IMAGE AVAILABLE	Class	-
		Filing date	22-04-2016
	NO IMAGE AVAILABLE	Registration date	22-04-2016
		Publication date	10-05-2016
	NO IMAGE AVAILABLE	Expiry date	-
		Effective date	-
	NO IMAGE AVAILABLE	Priority date	-
		End of deferment	-
	NO IMAGE AVAILABLE	Priority number	-
		Priority country	-
	NO IMAGE AVAILABLE	Exhibition priority	-
	NO IMAGE AVAILABLE	Design office	EM
		Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,CY,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
	NO IMAGE AVAILABLE	Indication of the product	undefined
		Verbal element	-
	NO IMAGE AVAILABLE	Application number	003491778
		Design number	003491778-0001
	NO IMAGE AVAILABLE	Registration number	003491778-0001
		Design status	Registered
	NO IMAGE AVAILABLE	Owner name	HAIJIRI
		Previous owner name	-
	NO IMAGE AVAILABLE	Representative's name	-
		Designer name	-
	NO IMAGE AVAILABLE	Class	-
		Filing date	30-11-2016
	NO IMAGE AVAILABLE	Registration date	30-11-2016
		Publication date	27-12-2016
	NO IMAGE AVAILABLE	Expiry date	-
		Effective date	-
	NO IMAGE AVAILABLE	Priority date	-
		End of deferment	-
	NO IMAGE AVAILABLE	Priority number	-
		Priority country	-
	NO IMAGE AVAILABLE	Exhibition priority	-

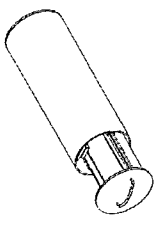

Find term anm:hajiri	NO IMAGE AVAILABLE	Design office	EM
		Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,CY,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
	NO IMAGE AVAILABLE	Indication of the product	undefined
		Verbal element	-
	NO IMAGE AVAILABLE	Application number	002778985
		Design number	002778985-0001
	NO IMAGE AVAILABLE	Registration number	002778985-0001
		Design status	Registered
	NO IMAGE AVAILABLE	Owner name	HAIJIRI
		Previous owner name	-
	NO IMAGE AVAILABLE	Representative's name	-
		Designer name	-
	NO IMAGE AVAILABLE	Class	-
		Filing date	24-09-2015
	NO IMAGE AVAILABLE	Registration date	24-09-2015
		Publication date	07-10-2015
	NO IMAGE AVAILABLE	Expiry date	-
		Effective date	-
	NO IMAGE AVAILABLE	Priority date	-
		End of deferment	-
	NO IMAGE AVAILABLE	Priority number	-
		Priority country	-
	NO IMAGE AVAILABLE	Exhibition priority	-
	NO IMAGE AVAILABLE	Design office	EM
		Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,CY,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
	NO IMAGE AVAILABLE	Indication of the product	undefined
		Verbal element	-
	NO IMAGE AVAILABLE	Application number	002955963
		Design number	002955963-0001
	NO IMAGE AVAILABLE	Registration number	002955963-0001
		Design status	Registered
	NO IMAGE AVAILABLE	Owner name	HAIJIRI
		Previous owner name	-
	NO IMAGE AVAILABLE	Representative's name	-
		Designer name	-
	NO IMAGE AVAILABLE	Class	-
		Filing date	23-01-2016
	NO IMAGE AVAILABLE	Registration date	23-01-2016
		Publication date	03-02-2016
	NO IMAGE AVAILABLE	Expiry date	-
		Effective date	-
	NO IMAGE AVAILABLE	Priority date	-
		End of deferment	-
	NO IMAGE AVAILABLE	Priority number	-
		Priority country	-
	NO IMAGE AVAILABLE	Exhibition priority	-

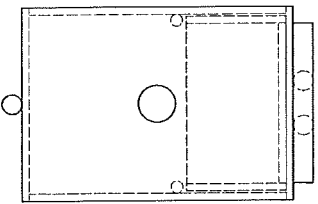

NO IMAGE AVAILABLE	Design office	EM
	Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,CY,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
	Indication of the product	undefined
	Verbal element	-
	Application number	003528959
	Design number	003528959-0001
	Registration number	003528959-0001
	Design status	Registered
	Owner name	HAJIRI
	Previous owner name	-
	Representative's name	-
	Designer name	-
	Class	-
	Filing date	20-12-2016

NO IMAGE AVAILABLE	Design office	EM
	Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,CY,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
	Indication of the product	undefined
	Verbal element	-
	Application number	003866219
	Design number	003866219-0002
	Registration number	003866219-0002
	Design status	Registered
	Owner name	HAJIRI
	Previous owner name	-
	Representative's name	-
	Designer name	-
	Class	-
	Filing date	21-04-2017

NO IMAGE AVAILABLE	Design office	EM
	Designated territory	LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,CY,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE
	Indication of the product	undefined
	Verbal element	-
	Application number	003866219
	Design number	003866219-0001
	Registration number	003866219-0001
	Design status	Registered
	Owner name	HAJIRI
	Previous owner name	-
	Representative's name	-
	Designer name	-
	Class	-
	Filing date	21-04-2017

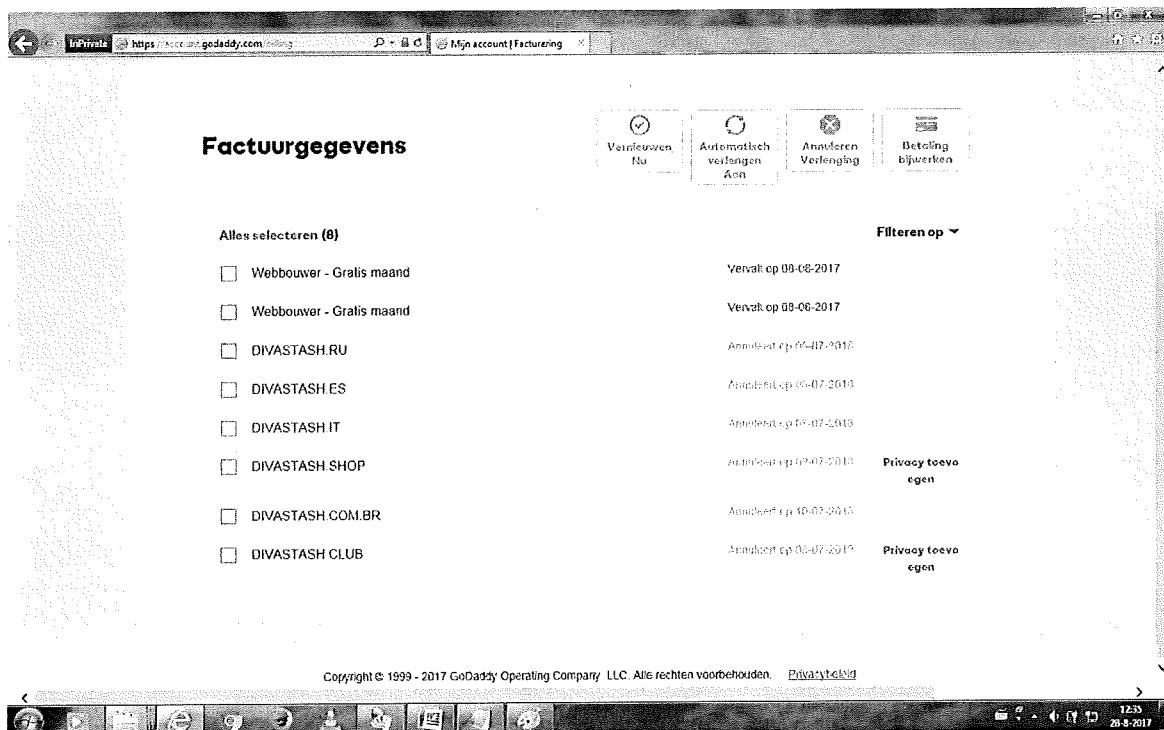
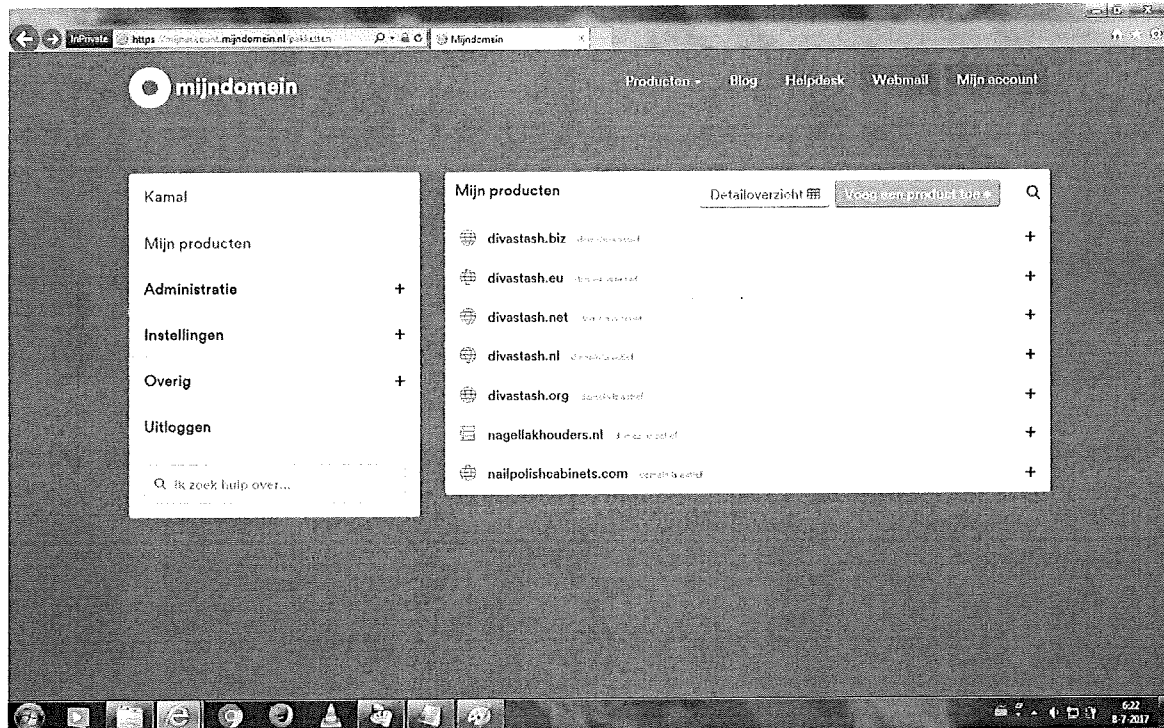
	Design office	BX
	Designated territory	LU,NL,BE
	Indication of the product	Behuizingen voor handspegeltjes
	Verbal element	-
	Application number	8656001
	Design number	86560-0001
	Registration number	86560-0001
	Design status	Registered and fully published
	Owner name	Kamal Hajiri
	Previous owner name	-
	Representative's name	-
	Designer name	-
	Class	03.01
	Filing date	-

	<p>Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Class Filing date Registration date Publication date Expiry date Effective date Priority date End of deferment Priority number Priority country Exhibition priority</p> <p>BX LU,NL,BE Nagellakhouders - 3973200 39732-0000 Registered and fully published Kamal Hajiri - - - 09.01.28.02 - 04-04-2014 21-05-2014 - - - - - - - - - -</p>
	<p>Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Class Filing date Registration date Publication date Expiry date Effective date Priority date End of deferment Priority number Priority country Exhibition priority</p> <p>BX LU,NL,BE Samengesteld meublaar - - 8662101 86621-0001 Registered and fully published Kamal Hajiri - - - - 06.05 - 22-08-2016 01-12-2016 - - - - - - - - -</p>

	<p>Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Class Filing date Registration date Publication date Expiry date Effective date Priority date End of deferment Priority number Priority country Exhibition priority</p> <p>EM LV,LU,LT,GB,HR,RO,HU,BG,FR,BE,DE,DK,FI,IE,CZ,AT,C Y,SE,SI,SK,IT,MT,PL,PT,EM,GR,ES,NL,EE Composite storage furniture - 002672824 002672824-0001 002672824-0001 Registered HAJIRI - - - Kamal Hajiri 06.05 31-03-2015 31-03-2015 13-01-2016 31-03-2020 - - - - - - - -</p>
	<p>Design office Designated territory Indication of the product Verbal element Application number Design number Registration number Design status Owner name Previous owner name Representative's name Designer name Class Filing date Registration date Publication date Expiry date Effective date Priority date End of deferment Priority number Priority country Exhibition priority</p> <p>BX LU,NL,BE Flacons voor nagellak - - 8627101 86271-0001 Registered and fully published Kamal Hajiri - - - - 09.01.09.03 - 14-01-2016 14-01-2016 - - - - - - - - -</p>

UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO
CASE 101662

APPENDIX 25 OTHER WEBSITES DIVASTASH REGISTERED



UDRP ADR KAMAL HAJIRI COMPLAINANT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO
CASE 101662

APPENDIX 26 DIVASTASH SOCIAL MEDIA

- facebook
- google, youtube
- instagram
- mail, hotmail, live
- pinterest
- twitter
- reddit
- tumblr
- vk
- pinterest
- flickr
- yahoo

UDRP ADR KAMAL HAJIRI COMPLAINT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO
CASE 101662 AMEND COMPLAINT

Kamal Hajiri
Weteringkade 22B
2515 AP 's Gravenhage
THE NETHERLANDS
kamalhajiri@hotmail.com

September 01, 2017

Czech Arbitration Court
To: Mrs. Angelica Lodigiani
Vladislavova 17, 110 00 Prague 1
Czech Republic

Dear Sir/Madam,

I am Kamal Hajiri, owner of several registered patents (EUIPO and USPTO), copyrights and the trademark 'DIVA STASH®'. As such, I like to start a UDRP procedure because of trademark infringement on disputed domain name 'www.divastash.com' by 'HOME OF DOMAINS' and 'NAMESILO.COM' which causes me damage.

- 1) **The domain name is identical or confusingly similar to a trademark in which the complainant has rights.** The complainant is owner of the EUTM 'divastash' registered on 24/06/2017 under number 016917536 for containers for cosmetics, trunks and suitcases, cupboards and mirrors in Nice classes 18, 20 and 21.
- 2) **The Respondent has no rights or legitimate interest in respect of the domain name.** To the best of complaint's knowledge, no person or entity anywhere in the world, other than the complainant, has the legal right to use the term 'divastash'. The word 'divastash' is an invented word. It does not appear in any dictionary and therefore, the word 'divastash' is to be considered dominant and distinctive.
- 3) **The domain name is registered and is being used in bad faith.** The respondent has no connection or affiliation of any kind in the specific market. The term 'divastash' has never been used for websites, trademarks or any commercial activity and therefore not known by the public until EUTM-office published the application on 05th July 2017. These circumstances indicating internet fraud, cybersquatting and preventing the owner of the trademark from reflecting the mark in a corresponding domain name. Respondents' bad faith is also evidenced by offering the website for sale, which also constitutes trademark and copyright infringement.

The complainant sent the respondent several warning letters by email and registered mail started on 09 July 2017 to stop the infringing use of the disputed domain name immediately. Up until now, these letters remained unanswered. Copy of the warning letters and printscreens of the disputed website as well as results of the EUIPO and EUTM database of TM number 016917536 and relevant documents have been attached to the complaint as an annex (appendix 01 – 26).

I, Kamal Hajiri started this project in 2013 to find the best solutions for women to store their nail polish and make up in a practical and stylish way. Different in this engineering-project is that time and money are subordinate to find the best solution of makeup storage. With the registration of all designs and trademark at the EUIPO the investment must be recouped. For marketing purposes it is of utmost importance that the disputed domain name 'www.divastash.com' to be transferred to the owner of the trademark.

01/09/2017

1/2

UDRP ADR KAMAL HAJIRI COMPLAINT WWW.DIVASTASH.COM/HOME OF DOMAINS - NAMESILO
CASE 101662 AMEND COMPLAINT

Also the inaccessibility of the CEO Mr. Goldfarb, the support desk of namesilo.com and Home of Domains makes it very bad. As a company they should know how it feels getting robbed like this.

All the above leads to the conclusion that the respondent has registered and is using the disputed domain name in bad faith.

I hope to have you informed enough to make a decision in this case.

Best Regards,

Kamal Hajiri

APPENDIX 01 PROGRESS PROCEDURE
APPENDIX 02 EMAIL CORRESPONDANCE C&D LETTER HOD
APPENDIX 03 WHOIS <https://www.whois.com/whois/divastash>
APPENDIX 04 website infringement divastash
APPENDIX 05 website infringement by namesilo
APPENDIX 06 EUTM 016917536
APPENDIX 07 EM500000016917536
APPENDIX 08 REPLY HOD ON C&D LETTER 07-10-2017
APPENDIX 09 EMAIL CORRESPONDANCE NAMESILO REPORT ABUSE
APPENDIX 10 EMAIL CORRESPONDANCE NAMESILO 01
APPENDIX 11 EMAIL CORRESPONDANCE NAMESILO 02
APPENDIX 12 CHAT namesilo
APPENDIX 13 EMAIL CORRESPONDANCE C&D LETTER HOD
APPENDIX 14 EMAIL CORRESPONDANCE C&D LETTER NAMESILO
APPENDIX 15 REGISTERED MAIL C&D LETTER NAMESILO
APPENDIX 16 RECEIPT REGISTERED MAIL C&D LETTER NAMESILO
APPENDIX 17 website infringement by namesilo
APPENDIX 18 website infringement divastash
APPENDIX 19 RECEIPT REGISTER MAIL C&D LETTER NAMESILO RECEIVED
APPENDIX 20 NAMESILO Reseller Complaint & Policies
APPENDIX 21 website infringement divastash
APPENDIX 22 website infringement by namesilo
APPENDIX 23 27082017_HAJIRI_EUIPO_dsv-result-list
APPENDIX 24 27082017_HAJIRI_EUIPO_dsv-result-list
APPENDIX 25 websites registration divastash
APPENDIX 26 social media registration divastash

APP. 28

On-line ADR Center of the Czech Arbitration Court (CAC)

Panel Decision

§ 15 of the UDRP Rules (Rules), § 9 of the CAC's Supplemental Rules (Supplemental Rules)

Case No. 101662
Time of Filing 2017-08-30 14:24:16
Disputed domain name DIVASTASH.COM

Case Administrator

Name Aneta Jelenová

Complainant

Name KAMAL HAJIRI
Address Weteringkade 22B
City, State (if applicable) Den Haag
Country Netherlands
ZIP/Postal Code 2515 AP
E-mail kamalhajiri@hotmail.com
Telephone +31630289573
Fax

Respondent

Organization HOME OF DOMAINS
Address 1928 E. Highland Ave. Ste F104 PMB# 255
City, State (if applicable) PHOENIX
Country United States
ZIP/Postal Code AZ 85016
E-mail domain@homeofdomains.com
Telephone +13478717726
Fax

Other Legal Proceedings

None.

Identification of rights

EU trademark no. 016917536: figurative mark comprising a butterfly image and the words DIVA STASH in classes 18, 20, 21; application date 24 June 2017, publication date 5 July 2017, registration date 12 October 2017.

Factual Background

The Respondent registered the disputed domain name on 24 June 2017 and has offered it for sale for \$950. The Respondent has not otherwise used the disputed domain name or any corresponding name.

No response has been filed.

Rights

The Complainant has, to the satisfaction of the Panel, shown the disputed domain name is identical or confusingly similar to a trademark or service mark in which the Complainant has rights (within the meaning of paragraph 4(a)(i) of the Policy), although the Complainant only acquired such rights when its trademark application was granted on 12 October 2017, subsequent to the filing of the Complaint and the appointment of the Panel.

No rights or legitimate interests

The Complainant has, to the satisfaction of the Panel, shown the Respondent to have no rights or legitimate interests in respect of the disputed domain name (within the meaning of paragraph 4(a)(ii) of the Policy).

Bad faith

The Complainant has not shown that the disputed domain name has been registered and is being used in bad faith (within the meaning of paragraph 4(a)(iii) of the Policy). The Respondent registered the disputed domain name on the same date as the Complainant filed the trademark application relied upon and before that application was published. The Complainant states that the name "DIVASTASH" was not used commercially and not known to the public before publication of the trademark application on 5 July 2017. There is no evidence that the Respondent could have known of the Complainant's interest in the trademark or in the name "DIVA STASH" when it registered the disputed domain name. Although the Respondent has offered the disputed domain name for sale, there is no evidence that it registered the domain name for the purpose of selling it to the Complainant or a competitor of the Complainant within the meaning of paragraph 4(b)(i) of the UDRP or has otherwise acted in bad faith.

Procedural Factors

The Panel is satisfied that all procedural requirements under UDRP were met once the complaint was amended following an indication from the CAC.

Principal Reasons for the Decision

No evidence of bad faith. Disputed domain name was registered on same date as trademark application filed and before it was published or granted.

Decision

For all the reasons stated above, the
Complaint is

Rejected

APP-28

and the disputed domain name(s) are to be

DIVASTASH.COM

Complaint rejected

Panellists

Name

Jonathan Turner

Date of Panel Decision

2017-10-14

Publication of the Decision

Publish the Decision

APP-29

[Home](#) [Tools](#) [About](#) [Contact](#)

About the divastash.com - Basic Information

Website /	divastash.com
Domain	
IP Address	167.114.213.199
Global Alexa	-
Rank	
Country Alexa	-
Rank	
Created on	2017-06-24T15:16:15Z
Expires on	-
Page Load Time	9.22 seconds

How socially engaged is divastash.com?

0
Share0
Comments

0

0
Share

0

0
views

Where is divastash.com hosted?

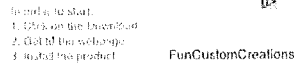
IP	167.114.213.199
City	Montréal
Region	QC
Area Code	0
Dma Code	0
Country Code	CA
Country Name	Canada
Continent Code	NA
Latitude	45.504
Longitude	-73.5747
RegionCode	QC
RegionName	Quebec

Search

Newly Added

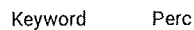
- deepfink.org
- hyundaipole.com
- topprospectstx.com
- hangfold.win
- lironghai.com
- za599.com
- adaptcarolina.com
- xedulichangson.net
- zyacintestosteronecomplex.net
- lianwuzhuangshi.com
- sequecomo.com
- xn--
- pss83kd1dlzkpum3yt51ucyl.com
- 3starcommunities.org
- wwwjs3309.com
- scalardevice.com
- 64levels.com
- topgameforkids.com
- zoho.gallery
- lifeskillshouse.com
- czosqc.com





No data available for this site.

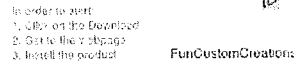
We do not have enough data to estimate these metrics. If this is your website, sign up and get certified to get direct measurement of your site's traffic.



Bounce Rate: -

Daily Pageviews per V

Daily Time on Site: -



Whois divasta's

Domain Name: DIVAS^{*}
Registry Domain ID: 216087911
Registrar WHOIS Service: universitair centrum universitaire antenne McGill
Registrar URL: http://v
Updated Date: 2017-08-29T15:15:15Z
Creation Date: 2017-08-29T15:15:15Z
Registry Expiry Date: 2018-08-29T15:15:15Z
Registrar: NameSilo, L.L.C.
Registrar IANA ID: 1479
Registrar Abuse Contact Email: abuse@namesilo.com
Registrar Abuse Contact Phone: +1.4805240066
Domain Status: clientTransferProhibited
<https://icann.org/epp#clientTransferProhibited>
Name Server: NS1.DNSOWL.COM
Name Server: NS2.DNSOWL.COM
Name Server: NS3.DNSOWL.COM
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: <https://www.icann.org/wic/f/>

For more information on Whois status codes, please visit <https://icann.org/epp>

NOTICE: The expiration date displayed in this record is the date the registrar's sponsorship of the domain name registration in the registry is currently set to expire. This date does not necessarily reflect the expiration date of the domain name registrant's agreement with the sponsoring registrar. Users may consult the sponsoring registrar's Whois database to view the registrar's reported date of expiration for this registration.

TERMS OF USE: You are not authorized to access or query our Whois database through the use of electronic processes that are high-volume and automated except as reasonably necessary to register domain names or modify existing registrations; the Data in VeriSign Global Registry Services' ("VeriSign") Whois database is provided by VeriSign for information purposes only, and to assist persons in obtaining information about or related to a domain name registration record. VeriSign does not guarantee its accuracy. By submitting a Whois query, you agree to abide by the following terms of use: You agree that you may use this Data only for lawful purposes and that under no circumstances will you use this Data to: (1) allow, enable, or otherwise support the transmission of mass unsolicited, commercial advertising or solicitations via e-mail, telephone, or facsimile; or (2) enable high volume, automated, electronic processes that apply to VeriSign (or its computer systems). The compilation, repackaging, dissemination or other use of this Data is expressly prohibited without the prior written consent of VeriSign. You agree not to use electronic processes that are automated and high-volume to access or query the Whois database except as reasonably necessary to register domain names or modify existing registrations. VeriSign reserves the right to restrict your access to the Whois database in its sole discretion to ensure operational stability. VeriSign may restrict or terminate your access to the Whois database for failure to abide by these terms of use. VeriSign reserves the right to modify these terms at any time.

The R

What is HTTP Headers of divastash.com

Transfer-Encoding: chunked
Connection: keep-alive
Vary: Accept-Encoding
Pragma: no-cache
X-Proxy-Cache: HIT
Cache-Control: no-store, no-cache, must-revalidate, post-check=0, pre-check=0

Afdeling
Bedrijfswerkzaamheden

L101F (e-filing)

Alicante, 24/06/2017

Kamal Hajiri
Weteringkade 22B
NL-2515 AP Den Haag
NEDERLAND

**Ontvangst van een aanvraag van een Merk van de Europese Unie en mededeling
van
voorlopige toekenning van een indieningsdatum
(artikel 25, lid 2 en artikel 27 UMV en regel 9 UMOV)**

<i>Aanvraagnummer:</i>	016917536
<i>Uw referentie:</i>	
<i>Handelsmerk:</i>	DIVA STASH
<i>Soort handelsmerk:</i>	Beeldmerk met tekst
<i>Aanvrager:</i>	Kamal Hajiri Weteringkade 22B 2515 AP Den Haag NEDERLAND

	<p>Wij berichten u dat uw aanvraag beschouwd wordt als Fast Track.</p> <p>De geldende voorwaarden voor Fast Track (de snelle procedure) en de termijnen zijn te vinden op http://euipo.europa.eu/fasttrack</p>
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Het Bureau heeft uw elektronische aanvraag op **24/06/2017 16:32:41** en bovengenoemd aanvraagnummer gegeven. Gelieve bij al uw contacten of in al uw correspondentie met het Bureau met betrekking tot deze aanvraag dit nummer te vermelden.

Indien voldaan is aan de vereisten van artikel 27 EMVO is de datum van indiening van dit merk **24/06/2017**.

Het Bureau moet de basisaanvraagtaken van **850 EUR** binnen één maand na de datum van indiening van de aanvraag hebben ontvangen. Als u wilt dat uw aanvraag in 'fast track' (versnelde procedure) wordt behandeld, moet u onmiddellijk betalen.

Als uw aanvraag meer dan één klasse van waren en diensten bevat, zal voor elke extra klasse een aanvullende taks moeten worden betaald. De aanvullende taks bedraagt **50 EUR** voor de eerste extra klasse en **150 EUR** voor elke verdere extra klasse.

Indien u om nationale rechercheverslagen heeft verzocht dan moet u de bijbehorende taks van **EUR 72**. De aanvraag wordt gepubliceerd zodra alle rechercheverslagen aan u zijn meegedeeld.